



KPU Telecommunications

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March 6, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90 - Expression of Interest
City of Ketchikan d/b/a KPU Telecommunications**

Dear Ms. Dortch:

The purpose of this letter is to express the City of Ketchikan d/b/a KPU Telecommunications (KPU) interest in participating in the Federal Communications Commission's rural broadband experiments.

Background

The City of Ketchikan d/b/a KPU Telecommunications (KPU) is a municipally owned rural incumbent local exchange carrier located in Ketchikan, Alaska. The city of Ketchikan is a remote, isolated community on Revillagigedo Island in SE Alaska located within the boundaries of the Ketchikan Gateway Borough (population of 13,938). Lacking any road connection to the outside world, the island-community of Ketchikan is located approximately 700 miles north of Seattle, and 800 miles south of Anchorage.

Within Ketchikan-proper KPU offers a full suite of residential and business services including voice, broadband, IPTV, OWAN, Hosted PBX, Hosted Data, etc.

KPU has made major investments in deploying fiber to the majority of the serving area, but some fringe areas are very challenging to serve (i.e., located on nearby islands) and do not presently have access to robust (or in some cases, any) broadband services. These areas include Pennock Island, Clam Cove, Gravina Island, and Clover Passage. KPU intends to offer advanced broadband services to Pennock and Gravina residents (and the nearby airport) via extension of KPU's fiber optic facilities to those areas. KPU intends to serve Clam Cove and

Clover Passage via installation of a fixed wireless system, connected to KPU's fiber optic cable system for backhaul.

Geographic Territory

The un-served or underserved areas mentioned above are in census tract TRACT;02130000400;4;1.

List of Anchor Institutions

This project will provide a redundant telecommunications network-connection and service to the Ketchikan International Airport (KTN). Serving as a central hub for the greater Ketchikan area, KTN averages approximately 110,000 passenger-boarding's per year. With 16,000 annual aircraft 'operations', or 43 take off/landings per day, including multiple daily north and southbound 737's, the National Plan of Integrated Airport Systems categorizes KTN as a Primary Commercial Service Airport. Unfortunately the airport (located on nearby Gravina Island) lacks road or bridge access to Ketchikan (passengers and employees shuttle to/from the airport via ferry). The airport's telecommunications services are provided via a single undersea channel-crossing copper cable which is susceptible to damage from maritime activity. KPU's proposed project will include construction of aerial fiber cable and related pole-line facilities to an area north of the airport – to connect to an existing undersea channel-crossing fiber optic cable – thereby completing a redundant loop to the airport – ensuring ongoing critical telecommunications service despite damage or outage of one of the two undersea cables. Both the Federal Aviation Administration and the National Oceanic and Atmospheric Administration will benefit from eliminating the present single point of failure as well as increasing the capability of OWAN services to exceed 1Gbps.

Proposed technology

Pennock Island and Gravina Island will be fiber served and all existing KPU services will be then be made available including voice, broadband, IPTV (I.e., KPU presently offers broadband speeds up to 55Mbps and also provides wide area network services above 1 Gbps to customers located in Ketchikan-proper). The Clam Cove and Clover Passage areas will utilize a fixed wireless system connected to the KPU fiber network for transport. Customers served via the new fixed-wireless service will have the option of broadband packages up to 10/1 Mbps.

State and/or Local or Tribal Government Participation in and/or Support for Project

Since KPU is owned by the City of Ketchikan, local government support for this project is inherent. There would be a small amount of additional support (\$15.17 per voice line per month) that KPU would receive in the form of state access revenues. We are not presently aware of any tribal government participation that would be garnered from this project. However, this census tract does include Alaska Native village statistical areas (ANVSAs).

Existing Providers

KPU is the only existing wireline provider in the areas covered by this project. However, in the areas in question, the existing KPU infrastructure either does not exist or is not adequate to provide robust broadband service.

Project Timeline

KPU estimates that it could start construction on this project within 3 months of receiving funding. Construction is estimated to take approximately one year provided that no major permitting delays were encountered.

Funding

We estimate that the capital cost to build this project would be less than \$1.5 Million. There would be a minimal impact to our total cost of operations, but it is likely that it would slightly increase our cost per loop that would necessitate some level of increased annual support.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "E. Cushing", enclosed within a large, loopy oval shape.

Edward L. Cushing
KPU Telecommunications Division Manager